

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHENMING HOLDINGS (HONG KONG)
LIMITED, *a Hong Kong limited company*,

Plaintiff,

-against-

JOHN DOES 1-10, individuals and/or entities
whose names are currently unknown to Plaintiff,

Defendants.

Civil Case No. 1:24-cv-00935-KPF

NOTICE OF MOTION FOR EXPEDITED DISCOVERY

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Motion for Expedited Discovery, the accompanying Declarations of Vincent Filardo, Jr., Esq., Chunxing Zheng, and Xianhong Xu in support thereof, Plaintiff Chenming Holdings (Hong Kong) Limited (“Chenming” or “Plaintiff”), by and through its counsel, King & Wood Mallesons LLP, shall move the Court before the Honorable Katherine Polk Failla, U.S.D.J, at the United States Courthouse, 40 Foley Square, Courtroom 618, New York, New York 10007, on a date and time to be determined by the Court, for an Order granting Plaintiff leave to conduct expedited discovery pursuant to Rule 26(d)(1) of the Federal Rules of Civil Procedure, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with Local Rule 6.1(a), any opposing affidavits and answering memoranda of law to this motion shall be served within seven days after service of the moving papers, and reply papers shall be served within two days after service of the answering papers.

Dated: New York, New York
February 26, 2024

Respectfully submitted,
KING & WOOD MALLESONS LLP

By: /s/ Vincent Filardo, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. Since the identities of Defendants are unknown to Plaintiff, I was unable to send a copy of the foregoing document and the accompanying motion papers to Defendants or their counsel at this time.

By: /s/ Vincent Filardo, Jr.
Vincent Filardo, Jr.